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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

ERICA FRASCO, et al.,

Plaintiffs,

v.

FLO HEALTH, INC., GOOGLE LLC,  
 FACEBOOK, INC., and FLURRY, INC.,

Defendants.

CASE NO. 3:21-cv-00757-JD (consolidated)

**JOINT TRIAL WITNESS LIST**

Judge: Honorable James Donato  
 Date Filed: June 12, 2025  
 Trial Date: July 21, 2025

1 In accordance with the Standing Order for Civil Trials Before Judge James Donato, the  
 2 parties submit the following Joint Trial Witness List as Exhibit A. This list includes witnesses  
 3 who are likely to be called at trial (other than solely for impeachment or rebuttal purposes),  
 4 including a brief statement describing the substance of the testimony to be given by each witness  
 5 and an estimate of time the witness's testimony is expected to take (direct and cross).

6 In order to streamline the presentation of evidence at trial, and to minimize the  
 7 inconvenience for all witnesses, the parties propose that each witness be called to testify only one  
 8 time, such that a witness who would otherwise be called in both the plaintiffs' and defendants'  
 9 case need not testify multiple times. The listing of witnesses on Exhibit A does not waive any  
 10 objections a party may have to such witness's testimony, in whole or in part.

11  
 12 Dated: June 12, 2025

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1 Dated: June 12, 2025

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**SIGNATURE ATTESTATION**

I am the ECF User whose identification and password are being used to file the foregoing Joint Trial Witness List. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Carol C. Villegas, attest that concurrence in the filing of this document has been obtained.

Dated: June 12, 2025

/s/Carol C. Villegas  
Carol C. Villegas

# **EXHIBIT A**

### 1. Plaintiffs' Case in Chief

	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
1.	Plaintiff Erica Frasco	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.
2.	Plaintiff Sarah Wellman	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.
3.	Plaintiff Jennifer Chen	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.
4.	Plaintiff Tesha Gamino	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.
5.	Plaintiff Autumn Meigs	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.
6.	Plaintiffs' Expert Jennifer Golbeck	Expert	Qualifications and background; Flo's use of SDKs; How Meta and Google advertising business works; Meta and Google's use of data; Meta's use of Flo Custom App Event data; Google's use of	4 hrs.



	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
			Flo Custom App Event data; explain documents reviewed and conclusions reached in expert report	
7.	Plaintiffs' Expert Serge Egelman	Expert	Qualifications and background; SDKs; Custom App Events; How the Flo app works; Flo App User Data transmitted to Defendants; non-consent for sharing data; explain documents reviewed and conclusions reached in expert report	4 hrs.
8.	Google's Witness Kevin Lam	Product Manager	Role and responsibilities; receipt and use of Flo User Data through SDKs or APIs data retention policy ; use of data from SDKs; Google's advertising platforms/algorithms; authentication of Google documents	2 hrs.
9.	Google's Witness Steve Ganem	Director of Product Management	Role and responsibilities re: Google Analytics; use of data from SDKs and Google's advertising platforms/algorithms; development and features of Google Analytics; data collected through Google Analytics; data privacy and storage; Flo's use of Google Analytics; Custom App Events; authentication of Google documents	2 hrs.
10.	Meta's Witness Tobias Woolridge	Software Engineer	Past/present role and responsibilities; Facebook SDK and advertising platforms/algorithms; Flo's use of Facebook SDK and data transmitted; Meta's use of data received from Flo; Meta integrity system; policies and/or procedures re: sensitive data; ad targeting and delivery optimization; data retention policy; authentication of Meta documents	2 hrs.
11.	Meta's Witness Anh Bui	Product Manager	Past/present role and responsibilities; Facebook SDK and advertising platforms/algorithms; standard and custom app events; ad privacy and safety; authentication of Meta documents	2 hrs.
12.	Flo's Witness Dmitry Gurski	CEO	Role and responsibilities during Class Period; How the Flo App works; what was the purpose of	2 hr.

	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
			the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents	
13.	Flo's Witness Max Scrobov	Chief Product Officer	Past/present role and responsibilities; data collected from Flo App Users; use of SDKs; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents	2 hrs.
14.	Flo's Witness Roman Bugaev	CTO	Past/present role and responsibilities; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents	2 hr.
<b>Additional Witnesses<sup>1</sup></b>				
15.	Google's Witness Maria Volchenok	Sales Manager	Role and responsibilities re: Flo; communications with Flo; review of Flo ads; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Google documents	2 hrs.
16.	Google's Witness Ben Ewing	Senior Staff Linguist	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.
17.	Google's Witness Alicia Cahill	App Specialist	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.

<sup>1</sup> At this stage Plaintiffs do not intend to call all Additional Witnesses and will work to narrow the witness list prior to trial. Plaintiffs reserve their right to call Additional Witnesses.

	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
18.	Google's Witness Tameem Mohsin	Global Product Lead, App Campaigns	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.
19.	Google's Witness Evgenia Olerinskaya	Industry Manager Export	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.
20.	Google's Witness Evan Huang	Software Engineer	Past/present role and responsibilities; authentication of Google documents	2 hr.
21.	Meta's Witness Anjali Dahiya	Director, Regulatory Readiness, Strategic Programs	Past/present role and responsibilities; Facebook SDK and nature of data collected; Custom App Events; privacy and data practices; user consent to the collection and use of personal data; Flo's use of Facebook SDK and transmission of data; investigation by NY State Dept. of Financial Services; authentication of Meta documents	2 hrs.
22.	Meta's Witness Wei Liu	Software Engineering Manager	Past/present role and responsibilities; Facebook SDK; Flo's use of the Facebook SDK and data transmitted; data retention and deletion; Meta personal integrity system; authentication of Meta documents	2 hrs.
23.	Flo's Witness Susanne Schumacher	Independent Consultant	Past/present role and responsibilities; departments/teams at Flo; collection and use of data provided by Flo App Users; data privacy; transmission of Flo App User data to third parties; authentication of Flo documents	2 hrs.
24.	Flo's Witness Eugene Tiunovich	Head of User Acquisition	Past/present role and responsibilities; promotion of Flo App and use of advertising platforms; tracking Flo App Users; use of the Flo app; authentication of Flo documents	2 hrs.
25.	Flo's Witness Kate Romanovskaia	Chief Brand & Communications Officer	Role and responsibilities during Class Period; authentication of Flo documents	2 hr.

	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
26.	Flo's Witness Timofei Savitski	Chief Legal & Compliance Officer at Flo Health Inc	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.
27.	Flo's Witness Alexei Azarov	Analytics Manager	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.
28.	Flo's Witness Tamara Orlova	CFO	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.
29.	Flo's Witness Valeriya Silenkova	Head of Support	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.
30.	Meta's Witness Karan Shah	Data Science Manager	Meta's use of data received from Flo for advertising purposes; authentication of Meta documents	2 hr.
31.	Google's Witness Oscar Takabvirwa	Ads & Content Investigation Manager	Google's use of data received from Flo; authentication of Google Interrogatory response	2 hr.
32.	Flurry Witness Bisera Ferrero	Head of Engineering	Authentication of Flurry documents	2 hr.
33.	Flurry Witness Nathalie Owen	Engineer	Authentication of Flurry documents	2 hr.
34.	Google Witness Brian Kennedy	Software Engineer	Authentication of Google documents	2 hr.
35.	Google Witness Morgan Kennedy	Product Manager	Authentication of Google documents; Google's response to FTC investigation	2 hr.
36.	Meta Witness Katy Dormer	Communications Director	Authentication of Meta documents; Meta's response to WSJ article	2 hr.
37.	Meta Witness Susan Glick	Communications	Authentication of Meta documents; Meta's response to WSJ article	2 hr.
38.	Flo Witness Vladislav Zhukov	Engineer	Authentication of Flo documents; Flo's sharing of user data	2 hr.

	<b>Witness</b>	<b>Title</b>	<b>Plaintiffs' Description of Anticipated Testimony</b>	<b>Plaintiffs' Time Estimate</b>
39.	Flo Witness Darya Palianskaya	Engineer	Authentication of Flo documents; Flo's sharing of user data	2 hr.
40.	Meta Custodian	Employee	Authentication of Documents	2 hr.
41.	Google Custodian	Employee	Authentication of Documents	2 hr.
42.	Flo Custodian	Employee	Authentication of Documents	2 hr.
43.	Certified Translator	Translator	Translation of Documents and Testimony	2 hr.
44.	Bayer Custodian	Employee	Authentication of Documents	1 hr.
45.	P&G Custodian	Employee	Authentication of Documents	1 hr.
46.	NYSDFS Custodian	Employee	Authentication of Documents	1 hr.
47.	FTC Custodian	Employee	Authentication of Documents	1 hr.

**Total Time Estimate (Hours): 94**

## 2. Defendants' Case-in-Chief

	<b>Witness</b>	<b>Affiliation</b>	<b>Substance of Defendants' Examination</b>	<b>Defendants' Time Estimate (in hours)</b>
1.	Roman Bugaev	Flo	<p><u>Flo</u>: Mr. Bugaev will testify to an overview of the mechanics of the Flo app, including how analytics data was shared with the analytics companies on a deidentified and encrypted basis and the dashboards Flo received in return; Flo's rationale for using SDKs; the different versions of the Flo app; Flo's organization and leadership; Flo's leadership in privacy; the programming of the Flo app; and topics addressed in his deposition.</p> <p><u>Meta/Google</u>: Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	.5 (Meta) 1-2 (Flo)

	Witness	Affiliation	Substance of Defendants' Examination	Defendants' Time Estimate (in hours)
2.	Dmitry Gurski	Flo	<p><u>Flo</u>: Mr. Gurski will testify to the content and services provided by the Flo app; an overview of Flo's practices in the collection, use, and sharing of data; Flo's business model; the founding of the Flo app; how the functionality of the Flo app has changed; Flo's culture, objectives, and priorities; Flo's strategic choices; and Flo's privacy policies, terms of service, and third-party agreements.</p> <p><u>Meta/Google</u>: Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	.5 (Meta) 1.5 (Flo)
3.	Anna Klepchukova	Flo	<p><u>Flo</u>: Dr. Klepchukova will testify to the operation of the Flo science and research team and its input into the content and services provided by the Flo app; Flo's business model and organizational structure; how the functionality of the Flo app has changed; Flo's objectives and priorities; Flo's strategic choices; and Flo's third-party agreements.</p> <p><u>Meta/Google</u>: Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	.5 (Meta) 1.5-2 (Flo)
4.	Laure Lydon	Flo	<p><u>Flo</u>: Ms. Lydon will testify to an overview of the Flo app's functionality, including but not limited to (i) the technical features of the Flo app and how those technical features allowed the Flo app to share analytic data with the analytics companies</p>	.5 (Meta) 1.5-2.5 (Flo)

	Witness	Affiliation	Substance of Defendants' Examination	Defendants' Time Estimate (in hours)
			<p>on a deidentified and encrypted basis and the aggregated dashboards that Flo received in return, (ii) Flo's use of neutral libraries of code and app event naming, (iii) Flo's adherence to privacy standards; (iv) Flo's consent screens with links to privacy policies and terms of use, (v) those terms themselves, and (vi) the integration of code and functionality into the Flo app; and topics addressed in her deposition.</p> <p><u>Meta/Google:</u> Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	
5.	Tamara Orlova	Flo	<p><u>Flo:</u> Ms. Orlova will testify to Flo's business model and financials, including but not limited to forgone revenue streams; Flo's priorities and objectives; and third-party agreements.</p> <p><u>Meta/Google:</u> Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	.25 (Meta) .75-1.25 (Flo)
6.	Max Scrobov	Flo	Mr. Scrobov will testify to Flo's practices in the collection, use, and sharing of data, including as it relates to analytics data; Flo's strategic choices; Flo's founding; Flo's commitment to privacy; Flo's engagement and discussions with third-parties; how the functionality of the Flo app has changed; how the Flo app integrates with third parties; Flo's strategy and business model; Flo's	1-2 (Flo)

	Witness	Affiliation	Substance of Defendants' Examination	Defendants' Time Estimate (in hours)
			response to media and regulatory inquiries; how users interface with the Flo app; the content and services provided by the Flo app; Flo's privacy policies and terms of use; and topics addressed in his deposition.	
7.	Susanne Schumacher	Flo	Ms. Schumacher, Flo's 30(b)(6), will testify to Flo's privacy policies, terms of use, data protection agreements, and practices; Flo's competitors; the interface of the Flo app and Flo's communications with users; Flo's engagements with third-parties; Flo's adoption of industry best practices for privacy and security; Flo's compliance with requirements; Flo's response to media and regulatory inquiries; and topics addressed in her deposition.	1-2 (Flo)
8.	Lorin Hitt	Flo's Expert	<u>Flo</u> : Dr. Hitt will testify to the opinions set forth in his expert report in this case, including but not limited to the fact that the at-issue data/information did not have economic value to anyone, including the putative class members or any of the defendants; and topics addressed in his deposition.	1.5-2.5 (Flo) .5 (Meta)
9.	Jim Karkanias	Flo's Expert	Mr. Karkanias will testify in anticipated rebuttal to the expert testimony of Dr. Serge Egelman, including but not limited to those rebuttal opinions that are identified in his rebuttal expert report in this case; and topics addressed in his deposition.	1-1.5 (Flo) .5 (Meta)



	<b>Witness</b>	<b>Affiliation</b>	<b>Substance of Defendants' Examination</b>	<b>Defendants' Time Estimate (in hours)</b>
10.	Brianna Arroyo*	Meta	Flo's and other third-party advertisers' use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's analytics and advertising services.	.5 (Meta)
11.	Oleksii Bagdasarov*	Meta	Flo's and other third-party advertisers' use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's analytics and advertising services.	.5 (Meta)
12.	Edward Dendievel*	Meta	Flo's use of the Facebook SDK and Facebook's Ads Manager.	1 (Meta)
13.	Tatiana Frantsuzenko*	Meta	Flo's use of the Facebook SDK and Facebook's Ads Manager.	1 (Meta)
14.	Alex Lapitski	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK and creation of Custom App Events; Flo's advertising campaigns through Meta.	1.5 (Meta)
15.	Fred Leach	Meta	Meta's Business Tools, including the Facebook SDK; Meta's Business Tools Terms; how and why advertisers use Meta's tools; Meta's signals integrity systems; and Meta's policies applicable to advertisers and developers.	3 (Meta)
16.	Goksu Nebol-Perlman	Meta	Meta's privacy-related initiatives; Meta's signals integrity systems and mitigation efforts; Meta's efforts to exclude health data; Meta's policies applicable to its users.	2.5 (Meta)

	<b>Witness</b>	<b>Affiliation</b>	<b>Substance of Defendants' Examination</b>	<b>Defendants' Time Estimate (in hours)</b>
17.	Julia Onuchina*	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's advertising services.	0.5 (Meta)
18.	Steve Satterfield	Meta	Meta's Business Tools, including the Facebook SDK; Meta's privacy-related initiatives; and Meta's policies applicable to advertisers and developers as well as its own users.	2 (Meta)
19.	Vasyl Sergiienko*	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's advertising services.	0.5 (Meta)
20.	Karan Shah [testimony by business records declaration, if plaintiffs agree]	Meta	Flo's advertising through the creation of Mobile App Custom Audiences; and other information related to Flo's ad campaigns.	0.75 (Meta)
21.	Jingwei Zheng*	Meta	Meta's signals integrity systems and mitigation efforts.	0.5 (Meta)
22.	Bo Zhu*	Meta	Flo's use of App Events via the Facebook SDK.	0.5 (Meta)
23.	Georgios Zervas	Defendants' Expert	SDKs and how developers may benefit from their use; SDKs that Flo used; how those SDKs, and the Facebook and Google SDKs operated; what types of data may have been transmitted by the Flo App using those SDKs; rebutting Serge Egelman's and Jennifer Golbeck's testimony; the	3 (Meta) 2 (Google) 1.5-2.5 (Flo)

	Witness	Affiliation	Substance of Defendants' Examination	Defendants' Time Estimate (in hours)
			opinions contained in Dr. Zervas's expert reports; and the topics addressed in Dr. Egelman's deposition.	
24.	Steve Ganem	Google	The functionality of Google Analytics ("GA"), including the Google Analytics for Firebase ("GA4F") SDK, and terms and policies applicable to GA4F.	2 (Google)
25.	Kevin Lam	Google	The Flo App's use of the Google Analytics for Firebase and Fabric SDKs, and the functionality of the Fabric SDK.	1.5 (Google)
26.	Oscar Takabvirwa	Google	Google Ads content classification as described in Declaration of Oscar Takabvirwa dated June 26, 2024 submitted ISO Rebuttal Expert Report of Georgios Zervas dated June 28, 2024.	0.8 (Google)
			<u>Total Time Estimates (in hours):</u>	47.05

This list contains Defendants' current, good faith list of witnesses Defendants are likely to call during their cases-in-chief. Defendants disclosed and/or designated deposition testimony of other witnesses who Defendants currently do not anticipate calling. That said, Defendants reserve the right to call any witness who was previously disclosed for potential trial testimony, if necessary, after Plaintiffs' witnesses testify. Defendants reserve the right to call a custodian of records for AppsFlyer, Flurry, Google, and Meta, and to call corporate witnesses to testify regarding corporate history and records. Defendants reserve the right to amend this list or the times allotted for witnesses in the event the set of participating plaintiffs or the scope of issues or claims to be tried changes, if any witness becomes unavailable, or in light of new information that becomes known. Defendants further reserve the right to withdraw any witnesses currently included on their list. Defendants further reserve the right to call any other witness for impeachment or in rebuttal and to examine any witness designated or called by another party.